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August 8, 2016

*A PROFESSIONAL CORPORATION

VIA ECF AND FAX

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 2204
New York, NY 10007

Re: Pacific Life Insurance Company, et al. v. U.S. Bank National Association, et al.,
Case No. 16-cv-00555-PGG

Dear Judge Gardephe:

I am counsel for Defendant Bank of America, N.A. ("Bank of America") and I write on behalf of Bank of America and Defendant U.S. Bank National Association (collectively, "Defendants"), with respect to the above captioned matter. I write this letter pursuant to Your Honor's Individual Rules of Practice in Civil Cases (the "Rules"), Section 4.H.

On March 31, 2016, Defendants submitted a pre-motion letter [Docket No. 59] requesting permission to file a joint motion to dismiss all claims in Plaintiffs' Complaint ("Pre-motion Request"). On April 7, Plaintiffs filed a responsive letter [Docket No. 62]. On April 14, 2016, at an Initial Pretrial Conference, Your Honor ordered Defendants to submit a response to Plaintiffs' April 7, 2016 letter, which Defendants submitted on April 27, 2016 [Docket No. 72].

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Honorable Paul G. Gardephe
August 8, 2016
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Per Your Honor's Rules, Section 4.H, the Defendants send this letter to alert the Court that the Pre-motion Request has not been decided within 90 days of April 27, 2016, the date on which Defendants submitted their response to Plaintiffs' response to the Pre-motion Request.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. Kreilkamp', with a stylized flourish at the end.

Jacob S. Kreilkamp

cc: All counsel of record (by ECF)